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UNITED STATES DISTRICT COURT  
 DISTRICT OF NEVADA

BALLY GAMING, INC., a Nevada corporation )  
 d/b/a BALLY TECHNOLOGIES, )  
 )  
 Plaintiff, )  
 )  
 vs. )  
 )  
 IGT, a Nevada corporation, )  
 )  
 Defendant. )

CASE NO. 3:06-CV-00483-ECR-(RAM)

**DEFENDANT IGT'S REQUEST TO FILE  
 DOCUMENTS UNDER SEAL AND  
 ORDER**

IGT, a Nevada corporation, )  
 )  
 Counterclaimant, )  
 )  
 vs. )  
 )  
 BALLY GAMING, INC., a Nevada corporation )  
 d/b/a BALLY TECHNOLOGIES, )  
 )  
 Counterdefendant. )

**REQUEST TO FILE UNDER SEAL**

Defendant, Counterclaimant Plaintiff and Third-Party Plaintiff IGT (“IGT”) respectfully requests that the Court allow IGT to file the following documents under seal:

- Defendant IGT’s Reply in Support of Its Motion for Leave to Amend Its Second Amended Answer, Counterclaims and Third-Party Complaint.

The Stipulated Protective Order Regarding Confidential and Privileged Information provides that, “To the extent that any Confidential or Highly Confidential Information is contained in, incorporated in, reflected in, described in, or attached to any document submitted to the Court, counsel shall file that submission under seal.” *See* Docket No. 54 at ¶ 12. The Order defines “Confidential” material as any information that the designating party has a good faith belief to be non-public. “Highly Confidential” material is any information that the designating party has a good faith belief to be proprietary information, trade secrets, or highly sensitive commercial or competitive information. *See id.* at ¶¶ 3-4.

Based on the foregoing, IGT respectfully requests that this Court order the aforementioned document to be maintained under seal.

1 DATED: June 24, 2008

KIRKLAND & ELLIS LLP

2  
3 By: /s/

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6 Brian G. Arnold  
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19 Attorneys for Defendant and Counterclaimant  
20 IGT, a Nevada corporation

21 IT IS SO ORDERED.

22 Dated: June 24, 2008.

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Hon. Robert A. McQuaid, Jr.  
United States Magistrate Judge

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing document entitled **IGT'S REQUEST TO FILE DOCUMENTS UNDER SEAL AND [PROPOSED] ORDER** was filed electronically in compliance with Local Rule 5-3. As such, this notice was served on all counsel who have consented to electronic service pursuant to Local Rule 5-4. Pursuant to Fed. R. Civ. P. 5 (b)(2)(A) and Local Rule 5-4, all other counsel of record not deemed to have consented to electronic service were served with a true and correct copy of the foregoing by First Class U.S. Mail on June 24, 2008.

/s/  
Linda C. Bassett